

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

KATORIA S. WILLIAMS and
DEMETRI M. FAULKNER,
Plaintiffs

v.

SHELBY COUNTY SCHOOL SYSTEM,
MEMPHIS CITY SCHOOL SYSTEM, and
REGISTERED AGENT, MAJORIE N.
DOUGLAS,
Defendants.

No. 2:17-cv-02284-TLP-cgc

JURY DEMAND

**CREDITOR'S RESPONSE TO DEBTOR'S MOTION
TO PAY JUDGMENT BY INSTALLMENT**

COMES NOW, the Creditor and would respond to Debtor's motion to set payments as follows:

1. That the requirement for any such motion is that it be filed in good faith.
2. Plaintiff has submitted her monthly salary as \$8,855.62.
3. In addition to not providing documentation of her income debtor has submitted unsworn to and unsubstantiated expenses of \$4,626.00 which even if taken at face value leaves \$4,229.82 per month available to satisfy this Court's judgment.
4. That judgment debtor has made no attempt to honor or pay this Court's judgment to date.

WHEREFORE, Creditor prays the motion be denied as filed but granted at \$4,229.00 per month being the balance left over after all debtor's expenses are allowed.

Respectfully Submitted:

/s/ Joe Barton
Joe Barton (#13494)
Attorney for Creditor
6565 Highway 51 North
Millington, TN 38053
(901) 872-4599
joe@jdbartonlaw.com

CERTIFICATE OF SERVICE

I, Joe Barton, Attorney for Creditor, hereby certify that a true and correct copy of the forgoing has been sent to Debtor's Attorney Darrell O'Neal via email to domemphislaw@darrelloneal.com

/s/ Joseph D. Barton